

1
2
3
4
5
6 UNITED STATES DISTRICT COURT FOR THE
7 WESTERN DISTRICT OF WASHINGTON
8 AT SEATTLE

9 CASE NO. 2:19-cv-02036-RSM

10 LASSANA MAGASSA,

11 Plaintiff,

12 v.

13 CHAD WOLF, *in his Official Capacity as*
14 *Acting Secretary of the Department of*
Homeland Security, et al.,

15 Defendants.
16

STIPULATED MOTION TO
EXTEND INITIAL SCHEDULING
DATES AND ORDER

17 COMES NOW Defendants Chad Wolf, David Pekoske, Mark Morgan, William
18 Barr, Christopher Wray, and Charles Kable, all in their official capacities (the “Official
19 Capacity Defendants”), through their counsel Antonia Konkoly, Trial Attorney, U.S.
20 Department of Justice; Defendant Agent Minh Truong in his individual capacity, by and
21 through his counsel Kristen Vogel and Sarah Morehead, Assistant U.S. Attorneys, United
22 States Attorney’s Office for the Western District of Washington; and Plaintiff Lassana
23 Magassa, by and through his counsel, in this stipulated motion to extend the initial
24 scheduling dates in this matter as follows:

25 Deadline for FRCP 26(f) Conference: 4/30/2020

26 Initial Disclosures Pursuant to FRCP 26(a)(1): 5/7/2020

27 Combined Joint Status Report and Discovery
28 Plan as Required by FRCP 26(f) and Local

This extension is warranted to afford the Defendants an opportunity to first respond to Plaintiff's Complaint. The Official Capacity Defendants and Agent Truong have each filed a motion to dismiss, briefing as to both of which is currently in progress and should be permitted to conclude before the parties proceed to resource-intensive discovery. Further, disruptions engendered by the current Coronavirus pandemic to the work of counsel for all parties further supports a postponement of the commencement of discovery, at this point in time.

DATED this 18th day of March, 2020.

SO STIPULATED

Respectfully submitted,

BRIAN T. MORAN
United States Attorney

s/ Sarah K. Morehead
Sarah K. Morehead, WSBA No. 29680

s/ Kristen Vogel
Kristen Vogel, NYBA No. 5195664
Assistant United States Attorneys
United States Attorney's Office
700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
Phone: 206-553-7970
Fax: 206-553-4067
Email: kristen.vogel@usdoj.gov
Email: sarah.morehead@usdoj.gov
Attorneys for Defendant Minh Truong

JOSEPH H. HUNT
Assistant Attorney General
TONY COPPOLINO
Deputy Branch Director
BRIGMAN J. BOWEN
Assistant Branch Director

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

/s/ Antonia Konkoly

Antonia Konkoly
Trial Attorney
U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L St. NW, Room 11110
Washington, DC 20005
(202) 514-2395 (direct)
(202) 616-8470
antonia.konkoly@usdoj.gov

*Counsel for the Official Capacity
Defendants*

/s/ Charles D. Swift

/s/ Christina A. Jump

Charles D. Swift
Counsel for Plaintiff
WA State Bar No. 41671
Christina A. Jump
Pro Hac Vice Counsel for Plaintiff
TX State Bar No. 00795828
833 E. Arapaho Rd., Suite 102
Richardson, TX 75081
Tel: (972) 914-2507
Fax: (972) 692-7454
cswift@clcma.org
cjump@clcma.org

/s/ Alisa R. Brodkowitz

Alisa R. Brodkowitz
Local Counsel for Plaintiff
WA State Bar No. 31749
Friedman | Rubin PLLP
1109 1st Ave., Ste. 501
Seattle, WA 98101
Tel: (206) 501-4446
Fax: (206) 623-0794
alisa@friedmanrubin.com

Counsel for the Plaintiff

1 **ORDER**

2 Pursuant to the parties' motion, and the parties having stipulated and agreed, and
3 the Court finding good cause, it is hereby **ORDERED** that the initial scheduling dates in
4 this matter shall be revised as follows:
5

6 Deadline for FRCP 26(f) Conference: 4/30/2020

7 Initial Disclosures Pursuant to FRCP 26(a)(1): 5/7/2020

8 Combined Joint Status Report and Discovery
9 Plan as Required by FRCP 26(f) and Local
10 Civil Rule 26(f): 5/14/2020

11
12
13 Dated this 18 day of March 2020.

14
15 

16 RICARDO S. MARTINEZ
17 CHIEF UNITED STATES DISTRICT JUDGE
18
19
20
21
22
23
24
25
26
27
28